

# **ATTACHMENT 1**

## **Schedule A**

### **Compliance Schedule for Moonbeam Gateway Marina**

<b>Compliance Requirement Par. No (2)</b>	<b>Preliminary Corrective Action Table No.</b>	<b>Issue</b>	<b>Corrective Action</b>	<b>Milestone Due within Specified No. of Days of the Effective Date</b>
i	1	Bathroom Tank Overflow	a. Conduct daily morning and evening inspections of bathroom/shower/pump out tanks (during the season when bathrooms and tanks are in use) and submit written certification of such.	10
i	1	Bathroom Tank Overflow	a. Submit the annual schedule for bathroom tank pump outs (during the seasons when the bathrooms are in use)	60
i	1	Bathroom Tank Overflow	c. Install portable toilets for the winter season, close and winterize the bathroom and shower trailer for the winter season, and submit written certification of such.	10
i	1	Bathroom Tank Overflow	d. Develop and submit a Comprehensive Spill Prevention Plan developed by licensed plumber to abate bathroom tank overflows including installation of high-level alarms for EPA Review. (Be sure to include the tank on the office bathroom and the Marina shower/bath trailer)	30
ii	2	Trash Compactor/Trash Collection	a. Remove Trash Compactor or Install new sorbent boom around storage pad (when a trash compactor or dumpster is present).	Within 10 days (when compact or dumpster present)
ii	2	Trash Compactor/Trash Collection	b. Remove Trash Compactor or create bermed concrete area around main trash dumpster/trash compactor and include measures in the SWPPP for monitoring and either hauling water within the containment for compliant off-site disposal or discharge stormwater from the containment if it is free of contaminants.	120
ii	2	Trash Compactor/Trash Collection	c. Comply with SWPPP to keep all dumpsters at the Facility covered when they are not actively being used and submit written certification of such.	15

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iii	3	Pressure Washing	a. Cease all discharges from the pressure wash containment area and pressure wash system and cease any and all pressure wash discharges in and around all stormwater outfalls and submit written certification of such.	10
iii	3	Pressure Washing	b. Revise Standard Operating Procedure Manual to include every facet of the Pressure Washing Operation (containment, pressure washing, backwash of pressure wash filters, disposal of all materials and wastewater associated with pressure washing, and any other needed procedures) to ensure that all pressure wash wastewater and solids are captured, not discharged and properly disposed of, including procedures to address the disposal of pressure washwater.	45
iii	3	Pressure Washing	c. Evaluate the siting of the pressure washing station. Determine if a sump can be installed inside the pressure wash containment to ease the recycling of the pressure wash water and report back to EPA with any findings and recommendations. Include the pressure washing station on the Site Map in accordance with Part III.A.6 of the Permit.	45
iv	4	Improperly discharged scraping/material waste	a. Follow the SWPPP regarding disposal of boat scraping waste and verify/revise SWPPP to include how scrapings will be disposed of (the type of waste (e.g., hazardous, non-hazardous and the final disposal location) and revise the SWPPP, as necessary, to address this potential pollutant source.	60

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iv	4	Improperly discharged scraping/material waste	b. conduct a daily walkthrough of the yard to identify its conditions, identify any illicit activities (e.g., boat scrapings, litter, paint cans, etc.) and conduct corrective actions as necessary. Keep a log of the daily walkthrough and document any problems identified during the inspection as well as any corrective action.	30
v	5	Leaking walls and/or roofs in Quonset Hut and Other Buildings at the Marina	Submit to EPA for review and approval a Building Renovation or Replacement Plan and Schedule (“Plan and Schedule”) to address the following: replacement, elimination, and/or repair of all storage containers, sheds, and Quonset Hut where materials associated with industrial activities (e.g., used oil, batteries, fluids, marina equipment, marina operations, compressor, used oil dry and other potential pollutant sources) are being stored and are exposed to stormwater due to leaking roofs and/or walls. If the Plan and Schedule is deemed insufficient, EPA will provide comments to Respondent within 60 days of Plan and Schedule submittal. Respondent will address the comments and resubmit its Plan and Schedule within 60 days of receipt of EPA's comments for a 2 <sup>nd</sup> round of EPA Review and Approval. This process will continue until EPA approves of Respondent’s Plan and Schedule.	60
vi	11.	SWPPP Benchmark Exceedances and Quarterly Visual Monitoring Pollutant Indication	a. Submit a Corrective Action Plan to address the Benchmark exceedances and pollutants in the quarterly visual monitoring samples consistent with Part V of the Permit and maintain Corrective Action documentation consistent with Part V.C of the Permit. Include necessary SWPPP revisions in a revised SWPPP.	45

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vii		Routine Inspections, Monitoring, Record Keeping	Respondent shall: a. conduct Monthly Routine Inspections required by Part IV.B, VII.Q and VII.R of the MSGP; b. conduct Semi-Annual Benchmark Monitoring at all outfalls as required by Part IV.D of the MSGP; c. conduct all Quarterly Visual Benchmark Monitoring at all outfalls as required by Part IV.E of the MSGP; d. submit written certification that Respondent is and will continue conducting all monitoring as required by Part IV and VII of the MSGP.	15
viii		Corrective Actions	Submit written certification that the Corrective Actions required by Part V of the MSGP will be documented and carried out in the time frame specified in Part V of the Permit and documented as required by Part V.C. of the Permit.	15
viii		Corrective Actions	b. Implement the Corrective Action Plan submitted under paragraph 11.a above before the next storm event, if practicable, but no more than within 12 weeks (rounded to 100 days) per Part V.A.2.a of the MSGP and submit written certification of such.  If implementation of the Corrective Action Plan will take longer than 12 weeks, then Respondent agrees to seek written approval from the Regional Water Engineer consistent with Part V.A.2.b of the MSGP and submit the approval letter to EPA.	100

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ix		Proper Operation and Maintenance and Good Housekeeping	a. Address any and all deficiencies identified in the Monthly Routine Inspections for the period September 2020 to the present. This should include documentation of corrective action to address the deficiencies identified in Table 3 of the Inspection Report from September 2020 to February 2021; b. Submit written certification that the Facility is being Operated and Maintained in accordance with Part H.15 of the Permit and that Good Housekeeping required by Part II.A.2 of the Permit is being conducted.	45
x		Revised SWPPP Submittal	Submit a revised Stormwater Pollution Prevention Plan ("SWPPP") that incorporates additional BMPs and the Corrective Actions in accordance with Part V.A.3 and Part III.E of the 2018 MSGP	120

**Attachment 2- Preliminary Corrective Action submitted by Moonbeam to EPA  
November 1, 2021**

MGWM: Environmental Corrective Actions (per Murray Lantner)							
*See below up to comments to the 10-24-2021 EPA/NYS/DEC site visit							
	Issue	Description	Corrective/Preventive Action	Time Frame/Deadline	Point Person	Action	10/28/2021 Update
1	Bathroom tank overflow	Overflow of the 2 <sup>nd</sup> most southern tank (third tank when counting from the north) at the bathroom with sewage on and around the tank.	1. The Marina must provide the actual schedule for inspecting and pumping the tanks; 2. Proper <u>daily</u> inspection and management of the tanks is necessary; 3. Flow meters might be considered for purchasing.	1. Upon monthly inspection 2. Daily morning and evening inspections	1. Dina Raynoza and Yulya Lulyanenko John Hart and Nelson Alvarez - report to the office 3. Dina Raynoza	1. Flow meters are being ordered by Gail - No 2. The Caspoo Men portable bathrooms will be installed today for the rest of the winter season. - Yes	Learned master plumber has been hired to create a comprehensive plan of spill prevention. Options considered floating meters in each tank, connecting 4 tanks and 2 floating meter with light detector.
2	Flattened sorbent boom	The sorbent boom around the dumpster is flattened and in poor condition.	1. The sorbent boom needs to be changed (checked in the inventory, ordered, if necessary).	Upon material's arrival	Veilly Gogol Benjamin Move	FIXED - new one installed. - Did not fix the issue.	Previously installed boom appeared deflated and wouldn't prevent the spill if occurred. New action: short cement wall around the perimeter will be built. Materials ordered by the yard manager. <a href="#">Ref "yard housekeeping for photos"</a>
3	Pressure wash training	The pressure wash machine and containment was used during the inspection. However, additional training on the backwash cycle of the pressure wash machine is needed because the backwash led to an overflow of the pressure wash water onto the ground.	1. Additional training on the backwash cycle of the pressure wash machine is needed. 2. Creating a training manual should be considered.	TBD	Veilly Gogol Benjamin Move Semyolina	<a href="#">Dina: Pressure Washing Inspection #4 is scheduled for 10-22-2021.</a>	1. Office staff will be supervising pressure wash jobs. 2. Chain of responsibilities within the yard crew has been set.
4	Improperly discharged scraping material/waste	In the northeastern portion of the marina there was evidence that a boat bottom was scraped onto ground, the material was on the ground and not properly disposed of.	1. Correct the issue mentioned in the description; 2. Identify how properly to dispose of the scrapings (on the ground in the future - downspout) procedure. 3. Daily walk through the yard.	1. <b>FIXED</b> 2. Dina/Benjamin 3. Veil - report to the office	Veilly Gogol Benjamin Move	<a href="#">Remediation have been cleaned/disposed of.</a>	Additional (yellow) containers with lids have been placed around the pressure wash area and the quonset hut for any paint/oil absorbent/and related materials to be disposed in, if necessary. <a href="#">Ref "yard housekeeping for photos"</a>
5	Leaking walls in quonset hut	Quonset hut and other buildings (where oil, gasoline, batteries, other materials are stored) have leaking walls and roofs. The stormwater from inside the buildings can discharge out of stormwater outfalls.	1. Proper housekeeping inside the hut to prevent any spills onto floor/side walls; 2. dewatering the outer surface of the hut.		Service Department/Yard staff/Office as supervising body		1. Service department cleaned/organized the hut; 2. Dewatering remains an option for when other preventive measures do not help. Will come back to this point in a few months.
6	Polyethylene in quonset hut	Gasoline in the Quonset hut was being stored in a polyethylene 55 gallon drum. Polyethylene is not an allowable storage container for gasoline and is potentially hazardous.	1. Remove polyethylene drums from the hut; 2. Find a safe alternative for storing gasoline.		Service Department - report to the main office	<a href="#">Removed by the Service Department Employees.</a>	
7	Yard housekeeping	Old boat stands, other materials are being stored outside and should be disposed of/recycled off-site.	1. Create a plan on how to dispose of boats: ref/repairs/reuse AND disposing of left over yard material, such as stands.	Slow season - ongoing project	Main office	Stands have been collected/assembled by the back hut. Next step - disposal of the old ones - need advice.	1. Stands have been moved from behind the hut to the area along the golf course. Wooden blocks will further be moved as well; 2. A comprehensive plan of reusing and removing of existing rusted stands (in slow season). <a href="#">Ref "yard stands for photos"</a>
8	Old/unused boats in the yard	There were unused, decaying boats in parts of the yard that need to be disposed of.	1. Create a plan on how to dispose of boats: ref/repairs/reuse; 2. Use inventory list to allocate old/unused boats; 3. Organize a designated row for boats to dispose on; 4. Create an ongoing list of boats for sale for office/website usage.	Slow season - ongoing project	Main office	See yard inventory spreadsheet for rows 7E, 8E, 9A for a full list of boats to be disposed of/old. <a href="#">December inventory job.</a>	<a href="#">"previous comment"</a>
9	Open drum with glycol	There was an open drum marked glycol was stored outside	1. Locate the open drum, find an alternative safe storage option for the material inside, then dispose of it properly.		Veilly Gogol	<a href="#">Removed by the Service Department Employees.</a>	
10	Monthly Inspections records (SWPP)	There were records of the required monthly inspections through January 2021, but no monthly inspection reports were available after January 2021.	1. Locate all existing records to date. 2. Scan/save on the server. 3. Place in the SWPP folder in the main office.	10/30/2021	Yulya Semyolina	<a href="#">January-September 2021 records filed.</a>	Records have been scanned and saved. February is missing - no yard staff appointed at that time.
11	SWPP Exceedances Remedy Plan	There were several exceedances of pollutant benchmarks for Iron, Aluminum, Zinc and Lead at many outfalls. Corrective actions to remedy the recent 2021, benchmark exceedances were not available and must be developed and implemented to reduce the metals concentration in the stormwater discharge. (Note the removal of rusting metal sheds, containers, boat stands, boat scrapings)	1. Develop corrective actions plan to remedy the recent 2021, benchmark exceedances; 2. Allocate roles/responsibilities, implement the plan. 3. Monitor and review monthly, or as needed.	11/15/2021	Dina Raynoza and Yulya Semyolina. Possible co-operation with Christine Falk.	<a href="#">Standards setting not a program that would follow ALL DEC/2015 laws and regulations.</a>	The plan will be developed upon receiving comments on the current state-of-affairs from EPA. The above preventive actions/corrective actions are a part of the plan.